

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

RUDOLPH W. GIULIANI  
a/k/a RUDOLPH WILLIAM GIULIANI

Case No: 23-12055

Debtor

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**DEBTOR'S MOTION FOR AN EXTENTION OF TIME TO FILE SCHEDULES OF  
ASSETS AND LIABILITIES, SCHEDULES OF EXECUTORY CONTRACTS, AND  
STATEMENTS OF FINANCIAL AFFAIRS**

TO: THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

1. Rudolph W. Giuliani (the “Debtor”), files this Debtor’s Motion for An Extension of Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts, and Statements of Financial Affairs (the “Motion”) and in support thereof, respectfully represents as follows:

**JURISDCTION AND VENUE**

2. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §157(b). Venue is proper pursuant to 28 U.S.C. §§1408 and 1409.

**BACKGROUND**

3. On December 21, 2023 (the “Petition Date”), the Debtor filed his voluntary petition for relief under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) commencing the above captioned case (the “Case”).

**RELIEF REQUESTED**

4. The Debtor requests an extension of the period in which to complete and file all outstanding schedules including but not limited to: Schedule A/B; Schedule C; Schedule D; Schedule I, Schedule J, Summary of Assets and Liabilities; Schedule of Executory Contracts and Statement of Financial Affairs (collectively, the “Schedules and Statements”) as required by Bankruptcy Code §521 and Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Bankruptcy Rule 1007(c) provides for the extension, for cause, of the time for the filing of the Schedules and Statements. Fed. R. Bankr. P. 1007(c).
5. In the few days before the filing, the Debtor was considering his options, including the possibility of filing a bankruptcy petition. On the afternoon of Wednesday December 20, 2023, Judge Howell accelerated the entry of the final judgment in the civil case pending in the Federal District Court in District of Columbia entitled “Freeman, et al v. Giuliani” (Docket No: 1:21-cv-03354). As a result, the Debtor decided that evening to commence the Chapter 11 proceeding.
6. Because the Debtor made the final decision to commence this case shortly before the filing, he did not have sufficient time to assemble the extensive information to complete the Schedules and Statement prior to the Petition Date. Obtaining all necessary information will require the Debtor to expend considerable time and effort.
7. Furthermore, due to the complexity of the numerous outstanding lawsuits, along with the various sources of income the Debtor receives, it will take additional time to for the Debtor to gather his financial information and for this Firm to review and analyze the information.
8. While Debtor is working diligently to prepare the Schedules and Statements, Debtor respectfully submits the importance of filing complete and accurate Schedules and

Statements in this case justifies the request for an extension of the deadline to file same and constitutes “cause” pursuant to Fed. R. Bankr. P. 1007(c). Debtor anticipates that he will be able to file the Schedules and Statements, all in the appropriate formats prescribed by the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of this Court, 45 days after the Petition Date or February 5, 2024. The 341 meeting of creditors has yet to be scheduled.

WHEREFORE, your affiant respectfully requests this Court enter an order pursuant to Rules 1007(c) and 9006(b) of the Federal Rules of Bankruptcy Procedure extending the Debtor’s time to file Schedules and Statements from January 4, 2024 to February 5, 2024 together with such other, further and different relief as this Court deems just, proper and equitable.

Dated: Syosset, New York  
December \_\_\_, 2023

BERGER, FISCHOFF, SHUMER,  
WEXLER & GOODMAN, LLP  
*Proposed Attorneys for the Debtor*



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Heath S. Berger, Esq.  
6901 Jericho Turnpike, Suite 230  
Syosset, New York 11791